

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

David L. Tillem, Esq.

1133 Westchester Avenue

White Plains, New York 10604

Tel: (914) 872-7104

Fax: (914) 323-7001

E-Mail: David.Tillem@WilsonElser.com

Attorneys for Defendant Monika Wrobel

File No.: 14734.00001

Hearing Date: Feb. 21, 2014

Time: 10:30 am

Objections: Feb. 14, 2014

Time: 4:00 pm

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Re:

ROMAN SLEDZIEJOWSKI,

Debtor.

Chapter 7

Case No.: 13-22050 (RDD)

MARIANNE T. O'TOOLE, as Chapter 7
Trustee of the Estate of ROMAN
SLEDZIEJOWSKI,

Plaintiff,

- against -

MONIKA WROBEL, RML DEVELOPMENT,
INC., JACRS, LLC, MLR DEVELOPMENT, INC.,
POL MARKETING, INC., JERAZ SLEDZIE-
JOWSKI, ELZBIETA SLEDZIEJOWSKI, PAUL
FOLKES, IRA S. KARABA, VIET HA DO,
LAWRENCE W. JACKSON, ESQ., JANE
DOE "1" through "10" and JOHN DOE "1"
through "10",

Defendants.

Adv. Proc. No.:

13-08317 (SHL)

**NOTICE OF MOTION OF WILSON ELSEER MOSKOWITZ EDELMAN &
DICKER TO WITHDRAW AS COUNSEL TO DEFENDANT MONIKA
WROBEL**

PLEASE TAKE NOTICE that on January 30, 2014, Wilson Elser Moskowitz Edelman & Dicker LLP, attorneys for the defendant, Monika Wrobel, filed a motion (the "Motion") seeking the entry of an order pursuant to SDNY Local Rule 2090 1 (e) granting leave to withdraw as counsel to the defendant Monika Wrobel, for cause, on the grounds of lack of cooperation, breakdown in the attorney-client relationship and failure to pay attorneys' fees.

PLEASE TAKE FURTHER NOTICE that a hearing will be held before the Honorable Sean H. Lane, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 on **February 21, 2014 at 10:30 a.m. (EST)** or as soon thereafter as counsel can be heard, to consider the Motion.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Motion must be in writing, must conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court for the Southern District of New York, must be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (with a hard copy delivered directly to Chambers), and any responses or objections must further be served upon: (i) counsel to Monika Wrobel, Wilson, Elser, Moskowitz, Edelman & Dicker, LLP, 1133 Westchester Avenue, White Plains, New York 10604, Attn: David L. Tillem, Esq; (ii) LaMonica Herbst & Maniscalco, LLP, counsel to the chapter 7 trustee Marianne O'Toole, 3305 Jerusalem Avenue, Suite 201, Wantagh, New

York 11793, Attn: Joseph H. Maniscalco, Esq. and Holly Rai, Esq., so as to be received
no later than **February 14, 2014 by 4:00 p.m. (EST)**.

PLEASE TAKE FURTHER NOTICE that if no objections to the
Motion are timely filed, served and received in accordance with this Notice, the
Bankruptcy Court may grant the relief requested in the Motion without further notice or
hearing.

Dated: January 30, 2014
White Plains, New York

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**
Attorneys for Monika Wrobel

By: /s/ David L. Tillem

David L. Tillem
1133 Westchester Avenue
White Plains, NY 10604
Tel. No. (914) 872-7104
Fax No. (914) 323-7001
david.tillem@wilsonelser.com
Our File No.: 14734.00001

TO: See the attached Service List

SERVICE LIST

Ms. Monika Wrobel (via US Mail and E-mail)
195 Evan Avenue
Ossining, New York 10562

LaMonica Herbst & Maniscalco
3305 Jerusalem Avenue
Wantagh, New York 11793
Attn: Joseph S. Maniscalco, Esq.
Holly Rai, Esq.

DelBello Donnellan Weingarten Wise & Wiederkehr, LLP
Rattet Pasternak Bankruptcy Practice Group
One North Lexington Avenue, 11th Floor
White Plains, New York 10601
Attn: Erica Feynman-Aisner, Esq.

Lowenstein Sandler LLP
1251 Avenue of the Americas
New York, New York 10020
Attn: David M. Banker, Esq.

Garvey Tirelli & Cushner Ltd.
50 Main Street, Suite 390
White Plains, NY 10606
Attn: Todd S. Cushner, Esq.

Hass & Gottlieb
670 White Plains Road, Suite 121
Scarsdale, New York 10583
Attn: Lawrence M. Gottlieb, Esq.

Thompson Hine LLP
335 Madison Avenue
New York, New York 10017
Attn: Barry M. Kazan, Esq.

Mahadeva PLLC
445 Hamilton Avenue, Suite 1102
White Plains, New York 10601
Attn: Prassana Mahadeva, Esq.

Lewis Brisbois Bisgaard & Smith LLP
77 Water Street
Suite 2100
New York, New York 10005
Attn: Mark K. Anesh, Esq.
Anthony Proscia, Esq.

Platzer, Swergold, Karlan, Levine, Goldberg & Jaslow, LLP
1065 Avenue of the Americas
18th Floor
New York, New York 10018
Attn: Teresa Sadutto-Carley, Esq.
Scott K. Levine, Esq.